

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: Target Corporation Customer Data  
Security Breach Litigation

This document relates to all Financial  
Institution cases

MDL No. 14-2522 (PAM/JJK)

**PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION TO  
ENJOIN RELEASES AGAINST  
TARGET AND TO LIMIT AND CURE  
MISLEADING AND COERCIVE  
COMMUNICATIONS WITH  
PUTATIVE CLASS MEMBERS**

Plaintiffs hereby move the Court for preliminary injunction to enjoin releases against Target and to limit and cure misleading and coercive communications with putative class members.

This Motion is based upon the Memorandum of Law, Declaration of Charles S. Zimmerman and exhibits filed contemporaneously herewith, and upon all files, records, and proceedings in this matter.

Dated: April 21, 2015

Respectfully submitted,

**CHESTNUT CAMBRONNE PA**

**ZIMMERMAN REED, PLLP**

By: s/ Karl L. Cambronne  
Karl L. Cambronne (MN 14321)  
Jeffrey D. Bores (MN 227699)  
Bryan L. Bleichner (MN 0326689)  
17 Washington Avenue North, Suite 300  
Minneapolis, MN 55401  
Telephone: (612) 339-7300  
kcambronne@chestnutcambronne.com  
jbores@chestnutcambronne.com  
bbleichner@chestnutcambronne.com

By: s/ Charles S. Zimmerman  
Charles S. Zimmerman (MN 120054)  
J. Gordon Rudd, Jr. (MN 222082)  
Brian C. Gudmundson (MN 336695)  
1100 IDS Center, 80 South 8th St.  
Minneapolis, MN 55402  
Telephone: (612) 341-0400  
charles.zimmerman@zimmreed.com  
gordon.rudd@zimmreed.com  
brian.gudmundson@zimmreed.com

*Coordinated Lead Counsel for Plaintiffs*

*Lead Counsel for Financial Institution  
Plaintiffs*

**REINHARDT WENDORF &  
BLANCHFIELD**

Garrett Blanchfield  
E-1250 First National Bank Building  
332 Minnesota Street  
St. Paul, MN 55101  
Telephone: (651) 287-2100  
g.blanchfield@rwblawfirm.com

*Coordinating Liaison Counsel*

**LEVIN, FISHBEIN, SEDRAN &  
BERMAN**

Howard J. Sedran  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106  
Telephone: (215) 592-1500  
hsedran@lfsblaw.com

**KESSLER TOPAZ MELTZER &  
CHECK LLP**

Naumon A. Amjed  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
namjed@ktmc.com

**SCOTT + SCOTT LLP**

Joseph P. Guglielmo  
The Chrysler Building  
405 Lexington Avenue, 40th Floor  
New York, NY 10174  
Telephone: (212) 223-6444  
jguglielmo@scott-scott.com

**HAUSFELD LLP**

James J. Pizzirusso  
1700 K Street NW, Suite 650  
Washington D.C. 20006  
Telephone: (202) 540-7200  
jpizzirusso@hausfeldllp.com

**LOCKRIDGE GRINDAL NAUEN  
P.L.L.P.**

Karen Hanson Riebel  
100 Washington Ave. S., Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
khriebel@locklaw.com

*Bank Liaison Counsel*

**BARRETT LAW GROUP, P.A.**

Don Barrett  
404 Court Square North  
PO Box 927  
Lexington, MS 39092  
Telephone: (662) 834-9168  
dbarrett@barrettlawgroup.com

**CARLSON LYNCH LTD**

Gary F. Lynch  
115 Federal Street, Suite 210  
Pittsburgh, PA 15212  
Telephone: (412) 322-9243  
glynch@carlsonlynch.com  
sfellows@carlsonlynch.com

**BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS MILES, P.C.**

W. Daniel Miles, III.  
272 Commerce Street  
PO Box 4160  
Montgomery, AL 36103-4160  
Telephone: (334) 269-2343  
dee.miles@beasleyallen.com

*Plaintiffs' Leadership Committee*